



CCWater response to consultation on updating the Western Wales River Basin Management Plan

A Natural Resources Wales Consultation

Consultation on updating the Western Wales River Basin Management Plan

1 Introduction

- 1.1 The Consumer Council for Water (CCWater) is the statutory body representing the interests of water and sewerage consumers across Wales and England. CCWater has a committee in Wales and four regional committees in England.
- 1.2 We welcome the opportunity to comment on Natural Resources Wales consultation on the Western Wales River Basin Management Plan. Given our particular remit, we have focussed on those questions and issues that directly relate to the customers of water and sewerage companies operating in Wales.

2 Response to questions

Consultation Question 1

Do you have any comments on the consultation document including suggestions on how we could improve this?

- a. Are the Management Catchment Summary documents helpful? Please provide us with comments on how we could improve them.**
- b. Does Water Watch Wales work for you? Do you have any suggestions for further improvements?**

- 2.1 Water Watch Wales provides a useful tool to understand the condition of water bodies in Wales, as does the spreadsheet analysis of all water bodies and their requirements.

Consultation Question 3

In section 4 we have set out proposals for new national measures. A list of all measures can be found in the planning overview annex.

Do you agree with the proposed measures?

- a. Are there national measures you would like to see included, please tell us why and provide any further information to inform the measures.**
- b. What do you consider to be the local priorities for actions?**
- c. What measures can you deliver to help improve the water environment? Please provide information on what these would be, where they could happen and how they would deliver improvement.**

- 2.2 We feel that more should be done to encourage non-water industry sectors, especially agriculture, to take a more proportionate level of responsibility for tackling pollution they have caused. So far, the water industry has shouldered the bulk of responsibility for, and cost of, improving water bodies. In the first

round of river basin planning, for example, the water industry in Western Wales was responsible for around 60% of the costs of tackling water pollution.

- 2.3 On this basis, we feel that the approach outlined in Scenario C is preferable to that outlined in Scenario D as it involves a lower level of water company expenditure. However, we suggest that National Resources Wales (NRW) considers how to incorporate measures for the non-water industry sectors from scenario D into the final river basin management plan, to increase their contribution towards making improvements.
- 2.4 For this reason, we support those national measures which encourage non-water industry sectors to take action. We see the following areas as particularly relevant:
- Schemes that support catchment and agri-environment land management, for example, through the Rural Development Plan.
 - Development of urban sustainable drainage systems (SuDS).
 - Septic tank registration, as a tool to help identify pollution hot spots.
 - Targeted campaigns to improve the operation of septic tanks and rural sewerage management.
 - Action and support to help small and medium sized businesses to understand their obligations in relation to priority substances.
 - Tackling pollution from abandoned quarries and mines.
 - Addressing the problems caused by physical modification of water bodies.
- 2.5 With the objective of encouraging the non-water industry sectors to do more in mind, we feel that efforts could be focussed in the following areas:
- 2.6 **Catchment management initiatives.** Catchment initiatives can be a good way to increase both the engagement of other sectors and the funds available for the work. However, the framework for developing catchment level measures needs to facilitate maximum effectiveness. Currently, we feel that there is a gap in management, coordination and clarity about the various schemes in Western Wales river basin district.
- 2.7 We have already discussed with NRW how communication about, and co-ordination of, catchment management schemes could improve. For example, more information can be shared about the linkages between schemes and learning points on how to improve delivery and effectiveness and monitor outcomes. We feel the Western Wales river basin management plan would benefit from a measure to specifically address this issue. We look forward to any learning points arising from the NRW's natural resource management trials in the Dyfi, Tawe and Rhondda areas.

- 2.8 **Ensuring effective enforcement of existing regulations and agricultural cross compliance standards.** Any process of environmental enforcement must be fit for purpose in that it should lead to a reduction in the level of problems that need to be tackled. Where enforcement is not robust or consistent, there is a risk of deterioration in the environmental quality of water bodies. Ultimately, this could lead to a challenge by the European Commission. We urge NRW to consider whether the current system of monitoring and enforcement in Wales delivers in this respect and, if not, what action to take.
- 2.9 **Tackling urban pollution.** Given a higher density of population, any work to improve water bodies in urban areas is potentially more visible to those who live near or have access to those water bodies. Even if this work is carried out by non-water industry sectors, may raise water customers' awareness of environmental requirements, and improvements in the quality of water bodies. This, in turn, could increase their willingness to pay for environmental improvements that their water company has to undertake.
- 2.10 **Encouraging rural sustainable drainage systems.** Rural SuDS can interrupt the pathway of water to water bodies, such as rivers and lakes, in a way that reduces pollution. While not a solution to every problem, we feel that more could be done to encourage and promote these systems, for example:
- For new commercial premises with the potential to damage the water environment, such as agricultural businesses, SuDS should be introduced at the planning stage, where possible; or
 - Where there is an existing pollution problem, SuDS can be retrofitted.

Consultation Question 5

In section 4 we explain that we need to develop a prioritised programme for delivery during the second cycle.

Do you agree that measures should be prioritised on the basis of statutory objectives (i.e. prevent deterioration and deliver protected area objectives) and evidence of the costs and benefits of outcomes?

- 2.11 The overall aim of the river basin management plans is to both prevent deterioration and get as many water bodies to good status as possible, in a way which fosters economic, environmental and social sustainability. As we have set out in response to question 3 above, we feel that the water industry is already contributing what it should and what it can. We therefore ask NRW to prioritise encouraging non-water industry sectors to take a more proportionate responsibility for the costs and burden of tackling pollution they have caused.

- 2.12 We feel that more could be done as follows:
- Ensuring further expenditure by Dwr Cymru Welsh Water, and the pacing of that expenditure, is both affordable and acceptable to its customers. If customers perceive that Dwr Cymru Welsh Water is paying a disproportionate share of overall costs, then this may reduce their willingness to pay for further, and wider environmental improvements.
 - Encouraging other sectors to tackle pollution at source by changing their behaviour. This may help to reduce future levels of pollution and the risk of water body deterioration; and it is a proportionate approach, in line with the polluter pays principle. If not enough is done to encourage this, it could undermine the achievement of the stated objectives and place the United Kingdom at risk of infraction proceedings.

Consultation Question 6

In section 4 we have modelled the costs and benefits of delivering improvements under four scenarios.

Are the scenarios and economic assessment we have provided as part of this plan helpful?

- 2.13 We understand the reasons for continuing to rely on the evaluations generated by the National Water Environment Benefits Survey in this round of river basin planning, even though these values remain contentious. However, we feel strongly that round three of river basin planning should be an opportunity to develop a new process for evaluating benefits. We are aware that work in this area has been started in England and would like to understand how NRW are approaching this issue.

Enquiries

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